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October 21, 2005

BY EMAIL

Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Certification: New York Mercantile Exchange, Inc.
Submission #05.189 (Listing of Additional Strike Prices for the
Gold, Silver, Copper, Heating Oil, Natural Gas, Crude Oil and Unleaded Gasoline
Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), COMEX Rule 16.03, COMEX Rule 17.04 and NYMEX Rule 300.20, the President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional strike prices be added for certain contract months in the Gold, Silver, Copper, Heating Oil, Natural Gas, Crude Oil and Unleaded Gasoline option contracts as detailed below:

(A) On October 18, 2005, the Exchange added a call and a put:

1. at the strike price of 525 for the December 2005 contract month of the Gold option contract;

2. at the strike prices of 13850 and 19500 for the December 2005 contract month of the Natural Gas option contract;

3. at the strike price of 29800 for the January 2006 contract month of the Heating Oil option contract;

4. at the strike prices of 31000 and 43000 for the February 2006 contract month of the Heating Oil option contract;

5. at the strike price of 20500 for the February 2006 contract month of the Natural Gas option contract;

6. at the strike prices of 13800, 16300, 17400 and 19250 for the March 2006 contract month of the Natural Gas option contract;

7. at the strike price of 15000 for the July 2006 contract month of the Natural Gas option contract;

8. at the strike price of 10550 for the September 2006 contract month of the Natural Gas option contract;

(B) On October 19, 2005, the Exchange added a call and a put:

9. at the strike price of 48000 for the February 2006 contract month of the Heating Oil option contract;

10. at the strike price of 18100 for the February 2006 contract month of the Natural Gas option contract;

11. at the strike prices of 13650, 14650, 16200, 17300 and 18800 for the March 2006 contract month of the Natural Gas option contract;

12. at the strike price of 1500 for the July 2007 contract month of the Silver option contract;

(C) On October 20, 2005, the Exchange added a call and a put:

13. at the strike price of 24900 for the January 2006 contract month of the Heating Oil option contract;

14. at the strike price of 28000 for the January 2006 contract month of the Unleaded Gasoline option contract;

15. at the strike prices of 8200 and 9200 for the February 2006 contract month of the Crude Oil option contract;

16. at the strike price of 16200 for the February 2006 contract month of the Natural Gas option contract;

(D) On October 21, 2005, the Exchange added a call and a put:

17. at the strike prices of 192 for the December 2005 contract month of the Copper option contract;

18. at the strike prices of 14100 and 17750 for the December 2005 contract month of the Natural Gas option contract;

19. at the strike prices of 40500 and 42000 for the February 2006 contract month of the Heating Oil option contract;

20. at the strike prices of 168 and 186 for the March 2006 contract month of the Copper option contract;

21. at the strike price of 14050 for the March 2006 contract month of the Natural Gas option contract;

22. at the strike price of 8400 for the March 2006 contract month of the Crude Oil option contract;

23. at the strike prices of 13300 and 16000 for the October 2006 contract month of the Natural Gas option contract; and

24. at the strike price of 2010 for the December 2010 contract month of the Crude Oil option contract.

Pursuant to the terms of COMEX Rule 15.03(c), COMEX Rule 16.03, COMEX Rule 17.04 and NYMEX Rule 300.20, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 15.03(c), COMEX Rule 16.03, COMEX Rule 17.04 and NYMEX Rule 300.20 permit such directed strike prices to be effective upon adoption, provided that notice to the CFTC is given within three business days of the strike price listing.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2207.

Very truly yours,

Brian Regan
Vice President & Counsel

cc: Christopher K. Bowen
George Henderson
Michael Campanelli
Donna Talamo